

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
CENTRAL DIVISION**

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**Case No. 18-04177-CV-C-NKL**

**FOURTEEN MISCELLANEOUS  
FIREARMS,**

**MISCELLANEOUS ROUNDS OF  
AMMUNITION,**

**Defendants.**

**NOTICE OF COMPLAINT FOR FORFEITURE**

TO: Robert Bacon  
c/o Scott A. Hamblin  
Brydon, Swearingen & England  
312 East Capitol Avenue  
P.O. Box 456  
Jefferson City, Missouri 65102

The enclosed Complaint is sent pursuant to Rule G(4)(b) of the Supplemental Rules of Admiralty or Maritime Claims and Asset Forfeiture Actions.

1. DATE OF NOTICE: August 30, 2018
2. FORFEITURE COMPLAINT: On August 29, 2018, the United States of America filed a civil complaint seeking forfeiture, pursuant to 18 U.S.C. § 924(d), in the United States District Court for the Western District of Missouri against the following defendant property:

Hi-Point 4595 Rifle, Caliber 45, Serial Number R49032,

Savage Stevens 94R Shotgun, Caliber 12, no serial number,

Harrington and Richardson Topper 88 shotgun, Caliber 12,  
Serial Number AX632602,

Remington Arms Company, Inc., 700 AAC-SD rifle, Caliber 308,  
Serial Number RR30816A,

Rock River Arms, Inc., LAR 15 rifle, Caliber 556, serial number  
CM03763,

Mossberg 500A Shotgun, Caliber 12, Serial Number T099763,

Taurus International 608 Revolver, Caliber 357, Serial Number  
S1761960,

Ruger Single Six Revolver, Caliber 22, Serial Number 153116,

SKB Arms XL900 Shotgun, Caliber 12, Serial Number  
S1997151,

Mossberg 500A Shotgun, Caliber 12, Serial Number 3135701,

High Standard C1200 Shotgun, Caliber 12, Serial Number  
3135701,

HS Products (IM Metal) XD45 Pistol, Caliber 45, Serial Number  
XD726998,

HS Products (IM Metal) XD9 Pistol, Caliber 9, Serial Number  
MD77430,

Remington Arms Company, Inc., 552 Viper Rifle, Caliber 22,  
Serial Number 3090925,

21,267 rounds of assorted ammunition and multiple calibers,  
which includes the following:

- 2750 rounds Federal ammunition, caliber 22
- 200 rounds unknown ammunition, caliber 9
- 900 rounds unknown ammunition, caliber 9
- 2800 rounds assorted ammunition, caliber multiple
- 102 rounds Federal ammunition, caliber 22
- 50 rounds Remington ammunition, caliber 45
- 1200 rounds unknown ammunition, caliber 45
- 58 rounds Sellier & Bellot ammunition, caliber 223

42 rounds Lake City ammunition, caliber 556  
25 rounds unknown ammunition, caliber 45  
4275 rounds assorted ammunition, caliber 22  
1000 rounds unknown ammunition, caliber 9  
1000 rounds unknown ammunition, caliber 9  
1000 rounds unknown ammunition, caliber 45  
750 rounds unknown ammunition, caliber 9  
5015 rounds unknown ammunition  
100 rounds American Eagle ammunition, caliber 556

50 component unknown ammunition, caliber 45, and

50 component assorted ammunition, caliber 357.

3. FILING OF A VERIFIED CLAIM: Pursuant to Supplemental Rule G(5)(a)(ii), in order to avoid forfeiture of the defendant property, any person who asserts an interest in the defendant property **must** file a verified claim within **35** days after the date of this notice or the date of delivery, if personally served.

4. CONTENTS OF VERIFIED CLAIM: Pursuant to Rule G(5)(a), the claim must (A) identify the specific property claimed; (B) identify the claimant and state the claimant's interest in the property; and (C) be signed by the claimant under penalty of perjury (see 28 U.S.C. § 1746).

5. FILING OF AN ANSWER: If you filed a verified claim, you **must** then file an answer to the complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure within 21 days after filing the verified claim.

6. FILING WITH COURT AND SERVICE ON UNITED STATES: The verified claim and answer **must** be filed with the Office of the Clerk, United States District Court for the Western District of Missouri, 400 E. 9<sup>th</sup> Street, Kansas City, Missouri, and a copy of the claim and answer or motion must be sent to Stacey Perkins Rock, Assistant United States Attorney, 400 E. 9<sup>th</sup> Street, Fifth Floor, Kansas City, Missouri 64106.

7. Any claim you filed with the seizing agency in an administrative proceeding and any petition you filed in a related criminal action are **NOT** a substitute for the claim you must file in this action which meets the requirements of and within the time allowed under Rules G(4) and G(5), as described above.

**Failure to follow the requirements set forth above may result in judgment by default taken against you for relief demanded in the Complaint. You may wish to seek legal advice to protect your interests.**

Timothy A. Garrison  
United States Attorney

By

/s/ Stacey Perkins Rock  
Stacey Perkins Rock  
Assistant United States Attorney  
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